

From: Richman, Taylor D.
Sent: Friday, October 27, 2017 11:04 AM
To: steven@justlaw.org
Cc: andrew@lewinterlaw.com; Haslitt, Naomi
Subject: Schectman v. UO: discovery matters
Attachments: UofO-Schectman - Defendants' First Request for Production to Plaintiff.docx; UO Release of Student Health Records__Ehvan Schectman.docx

Hi Steven,

I am writing with respect to a few discovery matters:

1. Attached please find a copy of defendant's first request for production of documents. A hard copy will follow by mail.
2. We would like to schedule Ehvan and your depositions, as the first depositions, for early January. Can you please let us know if there are any periods of time that you and Ehvan are not available in the first couple weeks in January? We presume that you would want those to occur in the office of your local counsel, Andrew Lewinter, but please let us know if we should reserve space in our offices. Once we have found a date that works, we will follow with a formal notice of the depositions.
3. In advance of next week's phone conference with Judge Russo, we also wanted to follow up regarding Ehvan's consent for the release of confidential health records maintained by the University of Oregon. We are attaching another copy of the consent form to this e-mail. If you have questions or would like to discuss please let us know before next Tuesday. We understand from previous conversations that Ehvan will be consenting to the release. If we do not have a signed consent form from Ehvan by the time we speak with the Judge, we anticipate notifying the court that we will seek a court order to access these documents. We hope, however, that can be avoided.
4. We would like to confer regarding plaintiff's initial disclosures. Based on our review of the documents plaintiff has produced, it appears that the following has not been provided:
 - Names and contact information of each individual with discoverable information, as required by FRCP 26(a)(1)(A)(i), and
 - A computation of each category of claims damages, as required by FRCP 26(a)(1)(A)(iii).

Our apologies if we inadvertently missed these documents. If not, please let us know before next Tuesday's phone call when we can expect to receive them.

Thanks, Steven, and we look forward to speaking with you next week.

Sincerely,
Taylor

Taylor D. Richman
Attorney

Miller Nash Graham & Dunn LLP

3400 U.S. Bancorp Tower | 111 S.W. Fifth Avenue | Portland, Oregon 97204

Direct: 503.205.2375 | Office: 503.224.5858 | Fax: 503.224.0155

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